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November 15, 2021

BY ECF

Hon. Jesse M. Furman
Thurgood Marshall United States Court House
40 Foley Square
New York, NY 10007

Re: P.T., et al. v. The Rockefeller University, No. 21-cv-06740-JMF

Dear Judge Furman:

We represent The Rockefeller University (formerly known as The Rockefeller Institute), of which The Rockefeller University Hospital (formerly known as The Rockefeller Institute for Medical Research) is a center (together, the "University"), in the above-referenced action. We write on behalf of the parties to jointly and respectfully request that the Court adjourn the Initial Pretrial Conference scheduled for December 8, 2021 to February 2, 3, or 4 in 2022 or to a convenient time for the Court thereafter. In addition, with Plaintiffs' consent, the University respectfully requests that the University's deadline to answer, move, or otherwise respond to the Amended Complaint (Dkt. No. 9, the "Amended Complaint") be extended by 60 days, from November 29, 2021 to January 28, 2022.

As noted in Plaintiffs' October 7, 2021 letter to the Court (Dkt. No. 10), the parties are engaged in active settlement negotiations. The parties make these requests to permit the negotiations to continue without expending resources in the litigation or imposing any burden on the Court. The parties have identified a mutually agreeable timeframe for the adjournment of the conference and the response to the Amended Complaint, which they believe will leave enough additional time to continue productive discussions, while ensuring that the litigation proceeds promptly if the case is not resolved.

There has been one prior request for adjournment of the Initial Pretrial Conference, which the Court granted (Dkt. Nos. 10, 11). This request for an additional adjournment is needed for the parties to continue to exchange documents and information in furtherance of the ongoing settlement discussions. This is the first request for an extension of the University's deadline to respond to the Amended Complaint. Other than the Initial Pretrial Conference and the deadline for the University to respond to the Amended Complaint, there are no upcoming appearances scheduled before the Court and no existing deadlines.

Thank you for your consideration of these requests.

Respectfully submitted,

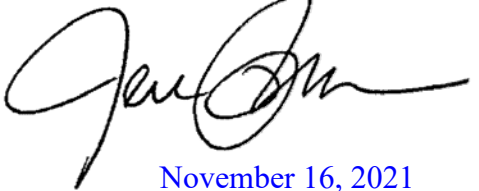
/s/ Mark S. Cohen

Mark S. Cohen

CC: All counsel (by ECF and email)

Application GRANTED. The initial pretrial conference currently scheduled for December 8, 2021, is hereby ADJOURNED to **February 2, 2022, at 3:30 p.m.** Defendant's deadline to answer or otherwise respond to the Amended Complaint is extended to **January 28, 2022**. The Clerk of Court is directed to terminate ECF No. 17.

SO ORDERED.



November 16, 2021